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Arizona Corporation Commission

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Attorneys for Environmental Defense Fund

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BEFORE THE ARIZONA CORPORATION COMMISSION

GARY PIERCE, CHAIRMAN
PAUL NEWMAN
SANDRA D. KENNEDY
BOB STUMP
BRENDA BURNS

IN THE MATTER OF THE APPLICATION OF
ARIZONA PUBLIC SERVICE COMPANY FOR
AUTHORIZATION FOR THE PURCHASE OF
GENERATING ASSETS FROM SOUTHERN
CALIFORNIA EDISON AND FOR AN
ACCOUNTING ORDER.

Docket No. E-01345A-10-0474

**NOTICE OF FILING WITNESS
SUMMARY OF TESTIMONY OF
ENVIORNMENTAL DEFENSE
FUND**

Environmental Defense Fund ("EDF"), through its undersigned counsel, hereby
provides notice that it has this day filed the written summary testimony of Bruce
Polkowsky in connection with the above-captioned matter.

DATED this 13th day of July, 2011.

ARIZONA CENTER FOR LAW IN
THE PUBLIC INTEREST

By

Timothy M. Hogan
202 E. McDowell Rd., Suite 153
Phoenix, Arizona 85004
Environmental Defense Fund

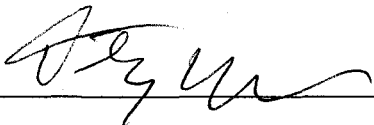
1 ORIGINAL and 13 COPIES of
2 the foregoing filed this 13th day
3 of July, 2011, with:

4 Docketing Supervisor
5 Docket Control
6 Arizona Corporation Commission
7 1200 W. Washington
8 Phoenix, AZ 85007

9 COPIES of the foregoing
10 electronically mailed this
11 13th day of July, 2011 to:

12 All Parties of Record

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Summary of Testimony
APS – Four Corners
Bruce Polkowsky on behalf of
Environmental Defense Fund

I. Summary of Direct Testimony

The Environmental Defense Fund supports the Arizona Public Service proposal in the context of its overall plan to retire Units 1-3, purchase Southern California Edison's ownership portion of Units 4 and 5, and implement advanced emissions controls for nitrogen oxides and other pollutants on Units 4 and 5. Under this overall strategy, there will be significant health and environmental benefits including reduced human exposure to ozone and mercury. Such reductions are estimated to reduce short-term health impacts, such as asthma attacks, as well reduce the long-term exposure effects that include risk of death from respiratory causes.

The resulting emissions reduction from APS overall strategy will better address Four Corners Power Plant's contribution to visibility impairment than EPA's proposed best available retrofit requirements.

Arizona Public Service's plans for retiring Units 1-3 and placing additional pollutant controls on Units 4 and 5 will result in substantial environmental benefits of reductions from reductions in emissions of nitrogen oxides, mercury, and carbon dioxide.

I provided estimates of additional visibility improvement at Federal Class I areas and qualitative information regarding lower impacts on human health and decreases in environmental impacts resulting from the APS proposal.